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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	2:10-CR-217-RFB
)	
DRAGOMIR TASKOV,)	
)	
Defendant.)	

**GOVERNMENT'S MOTION TO EXTEND THE TIME TO REPLY TO
TASKOV'S OPPOSITION (ECF NO. __) TO THE GOVERNMENT'S NOTICE
TO SUBSTITUTE AND TO FORFEIT PROPERTY (ECF NO. 382)
(First Request)**

The United States of America respectfully moves this Court for an Order extending the time for the government to reply to Dragomir Taskov's Opposition (ECF No. __) to the Government's Notice to Substitute and to Forfeit Property (ECF No. 382). The deadline for replying to the opposition may be May 5, 2016, since Dragomir Taskov (Taskov) is opposing a Notice, not a Motion. The government requests an extension of time to and including June 3, 2016.

The grounds for extending the time are as follows.

/ / /

/ / /

1 Although Taskov claims he mailed his opposition April 22, 2016 (ECF No. ____), it was not
2 postmarked until April 27, 2016. This office did not receive Taskov's opposition until May 2, 2016, thus
3 the deadline for replying to the opposition may be May 5, 2016.

4 The undersigned was unavailable Monday, May 2, 2016, has a large, active case load, and has a
5 unique complaint for forfeiture in rem and motion to draft and file, among other work. The undersigned
6 did not contact Taskov to determine whether he would agree to the extension because he is in prison. By
7 the time the government contacted him, the deadline for the reply would have passed.

8 This Motion is not submitted solely for the purpose of delay or for any other improper purpose.

9 This Court should grant an extension of time to, and including, June 3, 2016, for the United
10 States to reply to Taskov's opposition.

11 DATED: May 3, 2016.

12 DANIEL G. BOGDEN
13 United States Attorney

14 /s/ Daniel D. Hollingsworth
15 DANIEL D. HOLLINGSWORTH
16 Assistant United States Attorney

17
18 IT IS SO ORDERED:

19
20 

21
22 RICHARD F. BOULWARE, II
23 UNITED STATES DISTRICT JUDGE

24 DATED: May 9, 2016

PROOF OF SERVICE

A copy of the foregoing was served upon counsel of record via Electronic Filing on May 3, 2016, and by the below identified method of service:

First Class Regular Mail:

Dragomir Taskov
Register No. 44995-048
Giles W. Dalby Correctional Institution
805 North Avenue F
Post, TX 79356

/s/ Michelle C. Lewis
MICHELLE C. LEWIS
Paralegal Specialist